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NOTES OF CASES.

Criminal Law—Jurisdiction of Federal Courts—Lamar v. United States, 36 Sup. Ct. Rep. 255.—The United States Supreme Court in the principal case held that a Federal district court which has jurisdiction under the Judicial Code, Act March 3, 1911, c. 231, 36 Stat. 1091 (Comp. St. 1913, § 991), § 24, of all crimes cognizable under the authority of the United States, acts equally within its jurisdiction whether it decides a man to be guilty or innocent under the criminal law, and whether its decision is right or wrong. The court in the principal case used the following language: "On the matter of jurisdiction it is said that when the controversy concerns a subject limited by Federal law, such as bankruptcy (*Frederic L. Grant Shoe Co. v. W. M. Laird Co.*, 212 U. S. 445, 53 L. ed. 591, 29 Sup. Ct. Rep. 332), copyright (*Globe Newspaper Co. v. Walker*, 210 U. S. 356, 52 L. Ed. 1096, 28 Sup. Ct. Rep. 726), patents (*Healy v. Sea Gull Specialty Co.*, 237 U. S. 479, 59 L. ed. 1056, 35 Sup. Ct. Rep. 658), or admiralty (*The Jefferson*, 215 U. S. 130, 54 L. ed. 125, 30 Sup. Ct. Rep. 54, 17 Ann. Cas. 907), the jurisdiction so far coalesces with the merits that a case not within the law is not within the jurisdiction of the court (*The Ira M. Hedges* [*Lehigh Valley R. Co. v. Cornell S. B. Co.*], 218 U. S. 264, 270, 54 L. ed. 1039, 1040, 31 Sup. Ct. Rep. 17, 20 Ann. Cas. 1235; *Haddock v. Haddock*, 201 U. S. 562, 50 L. ed. 867, 26 Sup. Ct. Rep. 525, 5 Ann. Cas. 1). Jurisdiction is a matter of power, and covers wrong as well as right decisions. *Fauntleroy v. Lum*, 210 U. S. 230, 234, 235, 52 L. ed. 1039, 1041, 28 Sup. Ct. Rep. 641; *Burnet v. Desmornes y Alvarez*, 226 U. S. 145, 147, 57 L. ed. 159, 160, 33 Sup. Ct. Rep. 63. There may be instances in which it is hard to say whether a law goes to the power or only to the duty of the court; but the argument is pressed too far. A decision that a patent is bad, either on the facts or on the law, is as binding as one that it is good. *The Fair v. Kohler Die & Specialty Co.*, 228 U. S. 22, 25, 57 L. ed. 716, 717, 33 Sup. Ct. Rep. 410. And nothing can be clearer than that the district court, which has jurisdiction of all crimes cognizable under the authority of the United States (Judicial Code of March 3, 1911, chap. 231, § 24, second [36 Stat. at L. 1091, Comp. Stat. 1913, § 991 (2)]), acts equally within its jurisdiction whether it decides a man to be guilty or innocent under the criminal law, and whether its decision is right or wrong. The objection that the indictment does not charge a crime against the United States goes only to the merits of the case."

Carrier—Carrying Passenger beyond Station Not Regular Stop—Liability—Louisville & N. R. Co. v. Gaddie, L. R. A., 1915D, 705.—This case holds that a railroad company is not liable for carrying past his destination a passenger who knowingly boards a train not